

## **EXHIBIT 22**

1

2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK

3 -----X  
4 MARK I. SOKOLOW, et al.,

5 PLAINTIFFS,

6 -against- Case No:  
7 04CV397 (GBD) (RLE)

8 THE PALESTINE LIBERATION ORGANIZATION, et  
9 al.,

10 DEFENDANTS.  
11 -----X

12 DATE: July 31, 2012

13 TIME: 3:05 P.M.

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15 DEPOSITION of SHMUEL WALDMAN,  
16 taken by the Defendants, pursuant to Notice  
17 and to the Federal Rules of Civil  
18 Procedure, held at the offices of Morrison  
19 & Foerster, 1290 Avenue of the Americas,  
20 New York, New York 10104, before Robert X.  
21 Shaw, CSR, a Notary Public of the State of  
22 New York.

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25

1 Shmuel Waldman

2 A. No.

3 Q. I want to ask you a few  
4 questions about the day that you were shot.

5 I understand that you were shot  
6 in the leg and that the shooter was behind  
7 you; is that correct?

8                   A.            Correct.

9                   Q.        Okay.  Were you able to see the  
10                  face of the person that shot you?

11                   A.        I was not able to see the face  
12        of the person when they shot me.

13 Q. Okay. I take it then that you  
14 are not able to identify the person that  
15 shot you?

16                   A.        Um, I mean, I do have pictures  
17        of the scenery.

18                           If you were to show me a  
19       line-up of his face, no, I would not be  
20       able to identify him on facial features.

21 Q. You don't know who he is; do  
22 you?

23 A. I don't know who he is.

24 Q. You don't know what group he  
25 might have been affiliated with?

1 Shmuel Waldman

2 Q. For the period from roughly  
3 January of 2002 through January of 2005; is  
4 that what you are saying?

5                   A.       It would be until June of 2004,  
6       it is about two-and-a-half years.

7                   Q.        So you are saying that you were  
8        under orders of your doctor to not work --

9           A.       The first period I was not  
10      ordered by doctors not to work, I mean --  
11      it is a little bit of tough thing to get an  
12      exact description, um, of how it was  
13      qualified.

14                           During the period of my  
15   surgeries I was under the doctors' orders  
16   not to work.

17 Q. Let me make sure that the  
18 record is clear. You were shot on January  
19 22, 2002.

20 A. Correct.

21 Q. You did not at that time have a  
22 doctor's note saying that you could not  
23 work; is that correct?

24                   A.        Um, I mean, I was in a  
25 wheelchair and cast, and I don't remember